

The Honorable John H. Chun
The Honorable David W. Christel

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MAHSA PARVIZ,

Petitioner,

No. C23-1407-JHC-DWC

RESPONDENT'S SUPPLEMENT TO RECORD

HOWARD C. BARRON (Warden,
Federal Detention Center SeaTac),
COLETTE PETERS (Director, Bureau of
Prisons)

Respondent.

On May 16, 2024, the Court entered an Order Directing Respondent to Supplement the Record with an updated sentence computation and First Step Act (FSA) time credit assessment. Dkt. 59. Respondent hereby submits Exhibits 3 and 4, an updated FSA Time Credit Assessment and Sentence Computation for Mahsa Parviz.

Exhibit 3 is an updated FSA Time Credit Assessment, current as of May 7, 2024, which shows that Parviz continues to be assessed as a high risk to recidivate. She has earned a total of 200 days of FSA credits that she may not apply toward early release to supervision until she reduces her recidivism risk and meets the other requirements laid out in 18 U.S.C. § 3624(g)(1).

Exhibit 4 is an updated Sentence Computation, which projects Parviz's release date with good conduct time as January 3, 2026. If Parviz were eligible to have her FSA credits

1 applied to her sentence, it would advance her release to a date in June 2025. Parviz thereby
2 does not have an immediate concrete injury that would be redressed by her request that her
3 FSA credits be immediately applied, because any ruling by this Court will have no impact
4 on her current custody status.

5 For this reason, and the other reasons discussed in the answer to the petition,
6 Parviz's claim regarding FSA credits is not yet ripe and should be dismissed as non-
7 justiciable.

8 DATED this 16th day of May, 2024.

9 Respectfully submitted,

10 TESSA M. GORMAN
11 United States Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on May 16, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, and to be served on the Defendant, Mahsa Parviz, who is proceeding *pro se*, by First Class Mail to the following address:

Mahsa Parviz, Registration No. 54652-509
FCI Tallahassee
Federal Correctional Institution
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s/ John M. Price
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